

**U.S. District Court
Northern District of Texas (Dallas)
CIVIL DOCKET FOR CASE #: 3:24-cv-01152-N**

Vertiv Corporation v. Valtrus Innovations Limited
Assigned to: Chief District Judge David C Godbey
Cause: 28:2201 Declaratory Judgment

Date Filed: 05/14/2024
Jury Demand: Plaintiff
Nature of Suit: 830 Property Rights: Patent
Jurisdiction: Federal Question

Plaintiff

Vertiv Corporation

represented by **Timothy P Maloney**
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V.

Defendant

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Date Filed	#	Docket Text
05/14/2024	<u>1</u>	COMPLAINT WITH JURY DEMAND against Valtrus Innovations Limited filed by Vertiv Corporation. (Filing fee \$405; Receipt number ATXNDC-14617570) Summons(es) not requested at this time. In each Notice of Electronic Filing, the judge assignment is indicated, and a link to the <u>Judges Copy Requirements</u> and <u>Judge Specific Requirements</u> is provided. The court reminds the filer that any required copy of this and future documents must be delivered to the judge, in the manner prescribed, within three business days of filing. Unless exempted, attorneys who are not admitted to practice in the Northern District of Texas must seek admission promptly. Forms, instructions, and exemption information may be found at www.txnd.uscourts.gov , or by clicking here: <u>Attorney Information – Bar Membership</u> . If admission requirements are not satisfied within 21 days, the clerk will notify the presiding judge. (Attachments: # <u>1</u> Exhibit(s) A, # <u>2</u> Exhibit(s) B, # <u>3</u> Exhibit(s) C, # <u>4</u> Exhibit(s) D, # <u>5</u> Exhibit(s) E, # <u>6</u> Exhibit(s) F, # <u>7</u> Exhibit(s) G, # <u>8</u> Exhibit(s) H, # <u>2</u> Cover Sheet) (Davis, William) (Entered: 05/14/2024)
05/14/2024	<u>2</u>	NOTICE of <i>Filing of Patents Form – AO120</i> filed by Vertiv Corporation (Davis, William) (Entered: 05/14/2024)
05/14/2024	<u>3</u>	CERTIFICATE OF INTERESTED PERSONS/DISCLOSURE STATEMENT by Vertiv Corporation. (Clerk QC note: Affiliate entry indicated). (Davis, William) (Entered: 05/14/2024)
05/15/2024	<u>4</u>	New Case Notes: A filing fee has been paid. Pursuant to Misc. Order 6, Plaintiff is provided the Notice of Right to Consent to Proceed Before A U.S. Magistrate Judge (Judge Horan). Clerk to provide copy to plaintiff if not received electronically. (agc) (Entered: 05/15/2024)
05/15/2024	<u>5</u>	Report to Patent/Trademark Office of Initiating Document. Form AO 120 e-mailed to notice_of_suit@uspto.gov . (agc) (Entered: 05/15/2024)
05/15/2024	<u>1</u>	Case Reassigned to Chief District Judge David C Godbey per Special Order 3-340. Senior Judge A. Joe Fish no longer assigned to the case. (axm) (Entered: 05/15/2024)
05/20/2024	<u>6</u>	WAIVER OF SERVICE Returned Executed as to Valtrus Innovations Limited. Waiver sent on 5/16/2024. (Davis, William) (Entered: 05/20/2024)
05/22/2024	<u>7</u>	Application for Admission Pro Hac Vice with Certificate of Good Standing (Filing fee \$100; Receipt number ATXNDC-14639927) filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order)Attorney Daniel J Schwartz added to party Vertiv Corporation(pty:pla) (Schwartz, Daniel) (Entered: 05/22/2024)

05/22/2024	<u>8</u>	NOTICE of Attorney Appearance by Timothy P Maloney on behalf of Vertiv Corporation. (Filer confirms contact info in ECF is current.) (Maloney, Timothy) (Entered: 05/22/2024)
05/31/2024	<u>9</u>	NOTICE of Attorney Appearance by Rudolph Fink, IV on behalf of Vertiv Corporation. (Filer confirms contact info in ECF is current.) (Fink, Rudolph) (Entered: 05/31/2024)
06/06/2024	<u>10</u>	Application for Admission Pro Hac Vice with Certificate of Good Standing (Filing fee \$100; Receipt number ATXNDC-14675287) filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order)Attorney Allison Strong added to party Vertiv Corporation(pty:pla) (Strong, Allison) (Entered: 06/06/2024)
06/14/2024	<u>11</u>	ELECTRONIC ORDER granting <u>7</u> Application for Admission Pro Hac Vice of Daniel J. Schwartz. Important Reminder: Unless excused for cause, an attorney who is not an ECF user must register within 14 days of the date the attorney appears in a case pursuant to LR 5.1(f) and LCrR 49.2(g). (Ordered by Chief District Judge David C Godbey on 6/14/2024) (chmb) (Entered: 06/14/2024)
06/14/2024	<u>12</u>	ELECTRONIC ORDER granting <u>10</u> Application for Admission Pro Hac Vice of Allison Strong. Important Reminder: Unless excused for cause, an attorney who is not an ECF user must register within 14 days of the date the attorney appears in a case pursuant to LR 5.1(f) and LCrR 49.2(g). (Ordered by Chief District Judge David C Godbey on 6/14/2024) (chmb) (Entered: 06/14/2024)
08/01/2024	<u>13</u>	MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> filed by Valtrus Innovations Limited (Attachments: # <u>1</u> Proposed Order)Attorney Eric H Findlay added to party Valtrus Innovations Limited(pty:dft) (Findlay, Eric) (Entered: 08/01/2024)
08/01/2024	<u>14</u>	Brief/Memorandum in Support filed by Valtrus Innovations Limited re <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> (Findlay, Eric) (Entered: 08/01/2024)
08/01/2024	<u>15</u>	Appendix in Support filed by Valtrus Innovations Limited re <u>14</u> Brief/Memorandum in Support of Motion, (Attachments: # <u>1</u> Exhibit(s) A-D (APP001-APP040)) (Findlay, Eric) (Entered: 08/01/2024)
08/01/2024	<u>16</u>	Unopposed MOTION to Proceed Without Local Counsel filed by Valtrus Innovations Limited (Attachments: # <u>1</u> Proposed Order) (Findlay, Eric) Modified text on 8/2/2024 (cfk). (Entered: 08/01/2024)
08/09/2024	<u>17</u>	ELECTRONIC ORDER granting <u>16</u> Motion for leave to proceed without local counsel. (Ordered by Chief District Judge David C Godbey on 8/9/2024) (chmb) (Entered: 08/09/2024)
08/12/2024	<u>18</u>	ORDER REQUIRING STATUS AND SCHEDULING CONFERENCE: The parties are directed to confer within 14 days of the date of this Order regarding the following matters, and report to the Court within 14 days after the conference the parties' position. (Ordered by Chief District Judge David C Godbey on 8/12/2024) (cfk) (Entered: 08/12/2024)
08/16/2024	<u>19</u>	Application for Admission Pro Hac Vice with Certificate of Good Standing (Filing fee \$100; Receipt number ATXNDC-14846209) filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order)Attorney Patrick Doyle added to party Vertiv Corporation(pty:pla) (Doyle, Patrick) (Entered: 08/16/2024)
08/16/2024	<u>20</u>	MOTION for Extension of Time to File Response/Reply to <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order) (Davis, William) (Entered: 08/16/2024)
08/19/2024	<u>21</u>	ELECTRONIC ORDER granting <u>20</u> Motion to Extend Time to File Response. Plaintiffs response to defendants motion to dismiss is due August 29, 2024. (Ordered by Chief District Judge David C

		Godbey on 8/19/2024) (chmb) (Entered: 08/19/2024)
08/27/2024	<u>22</u>	NOTICE of Attorney Appearance by Nicole Danielle Sims on behalf of Vertiv Corporation. (Filer confirms contact info in ECF is current.) (Sims, Nicole) (Entered: 08/27/2024)
08/28/2024	<u>23</u>	MOTION for Extension of Time to File Response/Reply to <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order) (Davis, William) (Entered: 08/28/2024)
09/03/2024	<u>24</u>	RESPONSE filed by Vertiv Corporation re: <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> (Attachments: # <u>1</u> Proposed Order) (Davis, William) (Entered: 09/03/2024)
09/03/2024	<u>25</u>	Brief/Memorandum in Support filed by Vertiv Corporation re <u>24</u> Response/Objection, (Davis, William) (Entered: 09/03/2024)
09/03/2024	<u>26</u>	(Document Restricted) Vertiv's Unopposed Motion for Leave to File Under Seal (Sealed pursuant to motion to seal) filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order, # <u>2</u> Cover Sheet, # <u>3</u> Exhibit(s) Appendix 1, # <u>4</u> Exhibit(s) Appendix 2, # <u>5</u> Exhibit(s) Appendix 3, # <u>6</u> Exhibit(s) Appendix 4, # <u>7</u> Exhibit(s) Appendix 5) (Davis, William) (Entered: 09/03/2024)
09/09/2024	<u>27</u>	MOTION for Extension of Time to File Response/Reply to <u>14</u> Brief/Memorandum in Support of Motion, <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> filed by Valtrus Innovations Limited (Attachments: # <u>1</u> Proposed Order) (Findlay, Eric) (Entered: 09/09/2024)
09/09/2024	<u>28</u>	ELECTRONIC ORDER granting <u>27</u> Motion to Extend Time to File Reply. Defendants reply to its motion to dismiss is due September 27, 2024. (Ordered by Chief District Judge David C Godbey on 9/9/2024) (chmb) (Entered: 09/09/2024)
09/09/2024	<u>29</u>	Joint STATUS REPORT <i>Initial Case Management Report and Joint Rule 26(F) Discovery Plan</i> filed by Vertiv Corporation. (Davis, William) (Entered: 09/09/2024)
09/09/2024	<u>30</u>	ELECTRONIC ORDER granting sealed and/or ex parte motion <u>26</u> . Clerk to seal the Appendix to Plaintiff's Response to Defendant's Motion to Dismiss filed as Attachments 2–7. (Ordered by Chief District Judge David C Godbey on 9/9/2024) (rekc) (Entered: 09/09/2024)
09/09/2024	<u>31</u>	(Document Restricted) Sealed Appendix in Support re: <u>24</u> Response/Objection, filed by Vertiv Corporation. (Attachments: # <u>1</u> Additional Page(s), # <u>2</u> Additional Page(s)) (kcr) (Entered: 09/10/2024)
09/10/2024	<u>32</u>	Application for Admission Pro Hac Vice with Certificate of Good Standing (Filing fee \$100; Receipt number ATXNDC–14907923) filed by Vertiv Corporation (Attachments: # <u>1</u> Proposed Order) Attorney Matthew A. Werber added to party Vertiv Corporation(pty:pla) (Werber, Matthew) (Entered: 09/10/2024)
09/13/2024	<u>33</u>	ELECTRONIC ORDER granting <u>19</u> Application for Admission Pro Hac Vice of Patrick O. Doyle. Important Reminder: Unless excused for cause, an attorney who is not an ECF user must register within 14 days of the date the attorney appears in a case pursuant to LR 5.1(f) and LCrR 49.2(g). (Ordered by Chief District Judge David C Godbey on 9/13/2024) (chmb) (Entered: 09/13/2024)
09/13/2024	<u>34</u>	ELECTRONIC ORDER granting <u>32</u> Application for Admission Pro Hac Vice of Matthew A. Werber. Important Reminder: Unless excused for cause, an attorney who is not an ECF user must register within 14 days of the date the attorney appears in a case pursuant to LR 5.1(f) and LCrR 49.2(g). (Ordered by Chief District Judge David C Godbey on 9/13/2024) (chmb) (Entered: 09/13/2024)

09/13/2024)

09/27/2024	<u>35</u>	REPLY filed by Valtrus Innovations Limited re: <u>13</u> MOTION to Dismiss for Lack of Jurisdiction <i>Defendant Valtrus Innovations Limited's Motion to Dismiss for Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a)</i> (Findlay, Eric) (Entered: 09/27/2024)
10/11/2024	<u>36</u>	MOTION for Leave to File Vertiv Corporation's Opposed Motion for Leave to File Sur-Reply In Support of its Response to Valtrus' Motion to Dismiss For Lack of Jurisdiction or to Transfer Under 28 U.S.C. § 1404(a) filed by Vertiv Corporation (Attachments: # <u>1</u> Exhibit(s) A, # <u>2</u> Proposed Order) (Davis, William) (Entered: 10/11/2024)
10/15/2024	<u>37</u>	Order Transferring to Another District: Case transferred to Marshall Division of Eastern District of Texas. This case is stayed for 21 days pursuant to LR 62.2, clerk to calendar a reminder to transfer the case when the 21-day stay has elapsed. (Ordered by Chief District Judge David C Godbey on 10/15/2024) (axm) (Entered: 10/15/2024)